

STATE OF MARYLAND RECEIVED *

In the DISTRICT COURT of
MARYLAND for ANNE ARUNDEL
COUNTY in ANNAPOLIS

v.

2013 DEC -4 P 12:48

JARROD WARREN RAMOS
DISTRICT COURT OF MD
DISTRICT 7-1 ANNAPOLIS

Case No. 4A00231396

Case# : 02-C-13-184041

Certified Notice of Appeal

Defendant become Petitioner Jarrod W. Ramos notes an appeal of the above-captioned action to the Circuit Court for Anne Arundel County. A check for \$135 payable to that court is attached. This appeal arises from the Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202 (the "Petition") filed on January 30, 2013 and this Court's related rulings of February 12, 2013 and November 4, 2013. Assuming the State does not wish to confess to the allegations and consent to the requested relief of the Petition, the following relief is requested from the circuit court prior to a *de novo* action for the Petition:

- The judgement of the District Court denying the Petition be reversed.
- The Petition be remanded to the District Court for further proceedings.
- The District Court be ordered to observe and abide by Title 1, Title 3, and Chapter 1200 of Title 15 of the Maryland Rules.
- The District Court be ordered to commence and administer an action for the Petition as prescribed by law, to include an eventual hearing on the Petition.
- Administrative Judge McKenna and the body of District Court judges he is responsible for supervising be disqualified from that action.

The increasingly escalated improprieties of the District Court are detailed in part in the document titled Notice of Voluntary Dismissal and Judicial Disability, exhibited as attached. All statements in that filing are true. Furthermore, at the same time I was suing Judge McKenna (as stated in said Notice), he apparently thought it appropriate to preside over a criminal case in which I am the defendant. Fortunately for my safety, he was as lacking in jurisdiction as he was ethics. That matter (case number 02-K-13-000697, now before the Court of Special Appeals) will ultimately be resolved by a jury trial in the circuit court, if necessary.

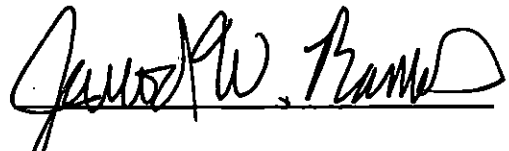
As Judge McKenna's order of November 4, 2013 was written with intent to contaminate the record in this case and manufacture obstacles to this appeal, an explanation of why this appeal is permissible may be necessary. "[A] writ of error coram nobis remains a civil action in Maryland, independent of the underlying action from which it arose." Skok v. State, 361 Md. 52, 760 A.2d 647 at 654 (2000) quoting Ruby v. State, 353 Md. at 678-9 (1999). As such, the Petition's denial recorded on February 12, 2013 constitutes a judgement under Rule 3-601.

As set forth in Rule 7-104, an appeal may only be taken within 30 days of entry of judgement. Under section (c) of that rule, however, a timely motion pursuant to Rule 3-534 deprives the judgement of its finality until withdrawal or disposition of that motion. A motion pursuant to Rule 3-535 filed within ten days of judgement has the same effect. Unnamed Attorney v. Attorney Grievance Commission, 303 Md. 473 (1985). The Motion for the Administrative Judge to Reassign Case and Revise Judgement, filed on February 22, 2013, is such a motion. As that motion was denied on November 4, 2013, this Court's judgement remains subject to appeal until December 4, 2013.

The circumstances surrounding the denial of "the Petition" on February 7, 2013 are not so mysterious upon reading the motion denied on November 4, 2013. Court papers cannot be filed by fax (*see* Rule 1-322) and that "judgement" was a nullity. Indeed, as illustrated by Exhibit B of the Motion to Revise, this Court's own computer system states "COMPLETED MTN SENT TO JUDGE" did not occur until February 12, 2013. If this Court insists on further obstructing the Petition, the proper means to do so is by striking this paper under Rule 7-105 if grounds exist. Such would be an appealable judgement. Pickett v. Noba, 122 Md. App. 566. As the recursive asininity of a further striking could perpetuate indefinitely, the next and final step before this appeal proceeds would be a second *mandamus* action.

I, the Petitioner, am prepared—once this case finally reaches the Circuit Court for Anne Arundel County—to further explain, if necessary, why the Petition states a valid claim even without amendment and why the requested relief is proper.

Aggrieved,

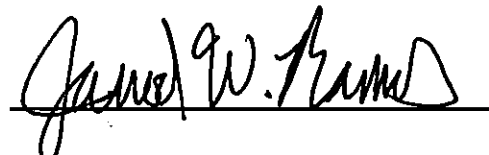


Jarrod W. Ramos
402 Armstrong Court, Apt. B
Laurel, MD 20707
301-604-4877

Petitioner's Affidavit

I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information, and belief.

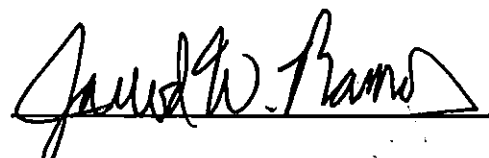
So sworn,



Jarrod W. Ramos

Certificate of Service

I do certify that on this 4th day of December 2013 I hand delivered a complete copy of this filing to the Anne Arundel County State's Attorney's Office at 251 Rowe Boulevard, Suite 332, in Annapolis, MD 21401.



Jarrod W. Ramos

IN THE DISTRICT COURT OF MARYLAND
SITTING IN ANNE ARUNDEL COUNTY (ANNAPOLIS)

Application for Order to Permit Inspection of Search Warrant

Maryland Rule 4-601(g) requires of this Court as follows:

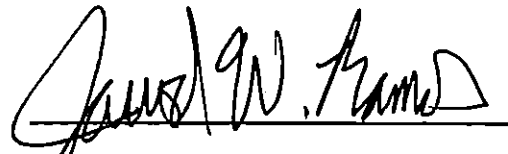
Upon application filed by a person from whom or from whose premises property is taken under a search warrant or by a person having an interest in the property ... the court of the county in which the search warrant is filed shall order that the warrant, inventory, and other related papers filed be made available to the person ... for inspection and copying.

This document is such an application. I, the undersigned, believe a search warrant issued by this Court was executed and property in which I have an interest was so taken. I hereby request this Court order the warrant and all related papers (inventory, application, and supporting affidavit) be made available for my inspection and copying.

Specifically, but not by way of limitation, I believe the warrant was issued as follows:

- Between the dates of May 10, 2011 and July 26, 2011.
- Filed in Maryland Judiciary case number 4A00231396.
- Upon application of Detective Robert Cremen.
- For the purpose of seizing my medical or mental health records.
- To be executed at 175 Admiral Cochrane Dr., Suite 110, in Annapolis, MD 21401.

Respectfully submitted,



Jarrod W. Ramos
402 Armstrong Court, Apt. B
Laurel, MD 20707
301-604-4877

Denied as search of District Court Clerk's office records and court records in District Court does not reveal issuance of a search warrant in the above referenced case.

2013 DEC -4 P 12:48

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Madam Clerk - please forward a copy of this application and ruling to the office of the State's attorney. John P. McKenna 12-6-13

*CC: 8702
248:127
12-9-13*

JARROD W. RAMOS

v.

JOHN P. McKENNA, JR.

RECEIVED

In the CIRCUIT COURT
of MARYLAND for
HOWARD COUNTY

2013 DEC -4

P 12:48

DISTRICT COURT OF 11
DISTRICT 7-1: ANNAPOLIS

Case No. 13-C-13-096646

Notice of Voluntary Dismissal and Judicial Disability

I, the plaintiff, sued the defendant in this action, the Administrative Judge of the District Court of Maryland sitting in Anne Arundel County, for the issuance of a writ of *mandamus*. My complaint was that he had refused to perform his judicial duties pertaining to a motion I filed in his court, and had done so for an unacceptably extended period of time. He has now admitted to this allegation. Additional discord with the Maryland Code of Judicial Conduct is also evident.

Judge McKenna's response to my pleading was due on November 4, 2013. On that same date he issued an order bringing disposition to my aforementioned motion in his court. As the relief requested in this action is now moot, I hereby dismiss my claim pursuant to Rule 2-506(a). This Court may yet wish to further consider what has transpired, however. "[M]andamus is an extraordinary remedy, to be reserved for extraordinary situations[.]" Philip Morris v. Angeletti, 358 Md. 689, 752 A.2d 200 at 255 (2000) (Cathell, J., dissenting) quoting Gulfstream Aerospace Corp. v. Mayacamas Corp., 485 U.S. 271, 289 (1988).

The facts of this case are indeed extraordinary. For over eight months the defendant has abandoned his post within an independent judiciary, only to return transformed, an agent of the State of Maryland. Also on November 4, 2013 he did appear before this Court with a filed motion for additional time to meet my moot complaint. This motion was filed through counsel from the Office of the Attorney General, though "mandamus actions 'have the unfortunate consequence of making the judge a litigant, obliged to obtain personal counsel or to leave his defense to one of the litigants before him.'" In re Vincent, 105 F.3d 943, 946 (4th Cir. 1997)

quoting Ex Parte Fahey, 332 U.S. 258 (1947). Accused of misconduct while presiding over an action to which the State is a party, the defendant has obtained representation by the State.

Maryland Rule 16-813, Code of Judicial Conduct Rule ("CJCR") 1.2:

(a) A judge shall act at all times in a manner that promotes public confidence in the **independence**, integrity, and **impartiality** of the judiciary.

(b) A judge shall avoid conduct that would create in reasonable minds a perception of impropriety.

* * *

[5] Actual improprieties include violations of law, court rules, and this Code. The test for appearance of impropriety is whether the conduct would create in reasonable minds a perception that the judge's ability to carry out judicial responsibilities with competence, **impartiality**, and integrity is impaired.

Judge McKenna's motion also betrays an about-face. The voice message I received from his counsel, left the night before the judge finally ruled on my long-suppressed motion, stated an intent to examine my "underlying allegations." The defendant was originally intending to justify, or perhaps merely further prolong, *sua sponte* and silently staying my *coram nobis* action. It was possibly this imminent examination that prompted his action. A copy of Judge McKenna's order is attached hereto, and while the correctness of his findings is neither before this Court nor an appropriate basis of judicial disability, his omissions and exclusions are.

The judge's ruling was to deny my motion. Though it is of vital significance for appellate purposes, his order states no date on which that motion was filed. Instead, on his second unnumbered page, he writes that "the same Petition" was ruled on twice and that "[t]he reasons and circumstances ... [are] unexplained[.]" But as shown, also attached, by a time-stamped copy of the first page of my motion, it was filed on February 22, 2013, and, according to paragraph 2, the first ruling was based on only a "fax copy of a copy of the first page[.]"

From there, Judge McKenna's order takes two general positions: (1) it is acceptable that his court disregard the Maryland Rules and (2) I have failed to state a claim upon which relief can be granted. He explains that even though his clerk never observed Rule 15-1203, it does not matter because I notified the State myself; also, because it appears the State does not "wish to confess to the allegations and consent to the requested relief," the judgement is not irregular. The State's silence, however, merely portends a contested hearing, and until his clerk provides the required notice (or his court orders) the State has no obligation to respond. Rule 15-1204.

Maryland Rule 16-813, CJCR 2.6:

(a) A judge shall accord to every person who has a legal interest in a proceeding, or that person's lawyer, the right to be heard according to law.

* * *

[1] The right to be heard is an essential component of a fair and **impartial** system of justice. Substantive rights of litigants can be protected only if procedures protecting the right to be heard are observed.

The defendant also admits that Judge Johnson chose to not observe Rule 15-1207(a), but excuses this as "interesting[]" and significant[]" because Judge Legum also did not follow Rule 15-1207(a) while rejecting an improperly presented fax transmission of an incomplete filing. Finally, Judge McKenna argues Rule 15-1207(a) need not be followed because the *coram nobis* petition does not set forth the necessary grounds. His order omits any finding that it is not in the interest of justice to allow amendment, *but see* Rule 15-1202(e) ("Amendment of the petition *shall* be freely allowed when justice so permits." (Emphasis added.)). Truly significantly, paragraph 16 of my complaint stated I am prepared to amend the petition.

Most significant of all, paragraph 18 reads: "The Petition alleges unethical and professionally sanctionable prosecutorial misconduct by Mary Virginia Miles on behalf of the

State of Maryland.” Judge McKenna’s order offers only a clue of what this refers to. As already noted, he cites the State’s declining to “confess to the allegations,” but addresses nothing resembling an allegation. “Mary,” “Virginia,” and “Miles” are all absent. In summary, it is reasonably perceptible that a judge is knowingly sheltering prosecutorial misconduct, and that the State has filed an unopposable motion to dismiss through that same judge.

While I expect further attempts at obstruction from the District Court of Maryland sitting in Anne Arundel County, I am thankful I can at last appeal. I will leave how else to proceed to the discretion of all courts, counsel, and other readers of this document, Honorable or otherwise.

Sincerely submitted,

Jarrold W. Ramos
402 Armstrong Court, Apt. B
Laurel, MD 20707
301-604-4877

Certificate of Service

I do certify that on this 12th day of November 2013 I sent by first class mail a complete copy of this filing and all attachments to the defendant’s counsel of record:

Michele J. McDonald
Assistant Attorney General
200 St. Paul Place, 20th Floor
Baltimore, MD 21202

Jarrold W. Ramos

STATE OF MARYLAND,

Plaintiff

vs.

JARROD WARREN RAMOS,

Defendant.

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IN THE

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DISTRICT COURT

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OF MARYLAND

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FOR

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ANNE ARUNDEL COUNTY
CASE #4A00231396

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ORDER

In this action, the Defendant Jarrod Warren Ramos (hereinafter "Defendant Ramos") has filed a pleading entitled "Motion for the Administrative Judge to Reassign Case and Revise Judgement." The procedural history necessary for the disposition of the instant motion is as follows.

On or about January 19, 2011, a statement of charges was issued in this matter charging the Defendant Ramos with two offenses including harassment, a course of conduct in violation of the Criminal Law Article §3-803, and also harassment through the use of electronic mail in violation of Criminal Law Article §3-805. On July 26, 2011, the Defendant Ramos entered a plea of guilty before Judge Legum to the charge of harassment, a course of conduct, and at sentencing a guilty finding was entered with a suspended sentence of 90 days plus fines and court costs totaling \$500. A period of supervised probation also was ordered as a part of the sentence. On or about October 19, 2011, the Defendant Ramos through counsel filed a Motion for Reconsideration, and on November 14, 2011, the Motion for Reconsideration came for hearing before Judge Legum at which time the guilty finding as to the sole count of harassment, a course of conduct, was stricken and a probation before judgment was granted. On or about

January 30, 2013, the Defendant Ramos, *pro se*, filed a "Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202." On February 7, 2013, this Court through Judge Jonas Legum denied the aforesaid Petition for Writ of Error Coram Nobis. Apparently five days later, the same Petition for Writ of Error Coram Nobis was presented for review by Judge Megan Johnson of this Court and on the same day, Judge Johnson also denied the Motion for Writ of Error Coram Nobis Pursuant to Rule 15-1202. The reasons and circumstances surrounding the denial of the same Motion by two separate judges of this Court is unexplained from a review of the file and it is possible that the same Petition for Writ of Error Coram Nobis was presented to two separate members of the bench as each received a copy of the same Petition. Nevertheless, both Judge Johnson and the original trial judge, Judge Legum, denied the Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202. Presently before the Court is the Defendant Ramos's "Motion for the Administrative Judge to Reassign Case and Revise Judgement" (hereinafter "Defendant's Motion to Revise"). For the following reasons, the Defendant's Motion to Revise will be denied.

In the Motion to Revise, the Defendant Ramos argues that the Clerk of the Court failed to give to the State's Attorney's Office notice of the filing of the Petition for Writ of Error Coram Nobis, and in Paragraph 13 of the Motion to Revise, the Defendant Ramos argues that the State "may wish to confess to the allegations and consent to the requested relief." The Court notes that in the original filing of the Petition for Writ of Error Coram Nobis, the Defendant Ramos forwarded pursuant to a properly submitted certificate of service a copy of the Petition to the Office of the State's Attorney. In the many months since the filing of the Petition for Writ of Error Coram Nobis, the Office of the State's Attorney has neither filed a response to the Petition nor has it indicated its willingness to consent to the relief requested by the Defendant Ramos in the Petition for Writ of Error Coram Nobis. A review of the file in this matter does reveal,

however, that the office of the Clerk did forward a copy of the denial of the Defendant's Petition for Writ of Error Coram Nobis by Judges Legum and Johnson at the time of the denial of those Motions in February of 2013. In the ensuing months since the denial of those Motions, the State's Attorney's office has neither objected to nor sought any further revision of those orders of denial.

In Paragraphs 14 and 15 of the Motion to Revise, the Defendant Ramos suggests that the Defendant has been denied a right to be heard on his Petition for Writ of Error Coram Nobis. However, a review of the Rules pertaining to Petitions for a Writ of Error Coram Nobis reveals that a hearing is not necessary in all circumstances, and Rule 15-206 (a) states in pertinent part:

“(a) Generally. The Court, in its discretion, may hold a hearing on the Petition. The Court may deny the Petition without a hearing but may grant the Petition only if a hearing is held. . .”.

Thus the failure to conduct a hearing on the Defendant Ramos's Petition for Writ of Error Coram Nobis is not sufficient grounds for the granting of the Defendant's Motion to Revise.

In Paragraphs 10 through 15 of the Defendant's Motion to Revise, the Defendant Ramos argues that he has been denied a fair hearing and that sufficient grounds exist for the request to “disqualify Judge Johnson from this proceeding” and to “reassign this proceeding to Administrative Judge McKenna.” In support of these arguments, the Defendant Ramos argues that the Court failed to comply with Rule 15-1207 (a) requiring a statement setting forth the ruling upon each ground contained in the Petition for Writ of Error Coram Nobis and the reasons for the ruling. Interestingly and significantly, it is apparent from a review of the Court's file in this matter, both the original trial judge, Judge Legum, and Judge Johnson, handling the matter as a chambers matter, both independently on separate dates denied the Defendant's Petition for Writ of Error Coram Nobis. Further, a review of the file in this matter and specifically the

Defendant's Petition for Writ of Error Coram Nobis reveals that sufficient grounds exist for the denial by both Judge Legum and Judge Johnson of the Defendant's Petition for Writ of Error Coram Nobis.¹ In Skok v. State, 361 Md. 52, 78-80, 760 A. 2d 647, 661-62 (2000), the Court recognizing the availability of the Writ of Error Coram Nobis commented on the qualifications to the application of the Writ of Error Coram Nobis:

"(1) The grounds for challenging the criminal conviction must be of a constitutional, jurisdictional or fundamental in character. (2) A presumption of regularity attaches to the criminal case, and the burden of proof is on the Coram Nobis petitioner. (3) The Coram Nobis petitioner must be suffering or facing significant collateral consequences from the conviction."

In the Defendant Ramos's Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202, the Defendant Ramos fails to set forth any significant collateral consequence from the conviction. In the Petition for Writ of Error Coram Nobis, the Defendant Ramos cites a July 31, 2011 article in a local newspaper, the Capital, the subject of which included the criminal action filed against the Defendant in the instant case. In the Petition for Writ of Error Coram Nobis, the Defendant Ramos argues that the publication of the article in the Capital resulted in the publication of defamatory statements and "false light invasion of privacy" as possible grounds for civil actions against the local newspaper. (See Paragraphs 11 and 12 of the Petition for Writ of Error Coram Nobis.) Further, the Defendant Ramos cites as other grounds for the Petition for Writ of Error Coram Nobis the posting of emails or "social media" exchanges from other citizens of Anne Arundel County commenting upon the content of the article published in the Capital. In Skok v. State, *supra*, the Court of Appeals discussed the types of significant collateral consequences that might justify the filing of a Petition for Writ of Error Coram Nobis including such consequences as negative immigration consequences or possible enhanced penalties upon

¹ It is significant to note that Defendant Ramos did not note an appeal from the denial of his Petition for Writ of Error Coram Nobis in February of 2013 by written order of Judge Legum and Judge Johnson.

subsequent criminal convictions. In this case, the Defendant Ramos has cited no such consequence as a possibility of his conviction for the offense in this action, and he cites no authority for the proposition that the publication of an article by an independent newspaper and the possibility of a defamation suit is a significant collateral consequence. Further, the Court notes that the article has already been published and the proper means to address any damages flowing from such alleged defamatory and alleged "false light invasion of privacy" would be through the prosecution of a civil suit by the Defendant Ramos against the alleged tortfeasors. The Court is satisfied that the grounds cited by the Defendant Ramos in his Petition for Writ of Error Coram Nobis failed to satisfy the requirement for a "significant collateral consequence from the conviction."

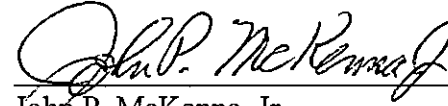
Also, in the Petition for Writ of Error Coram Nobis, the Defendant Ramos has failed to set forth any grounds for challenging the criminal conviction which are of a constitutional, jurisdictional or fundamental ground in character. Although Rule 15-1203 (c) requires that "the petitioner shall attach to the petition all relevant portions of the transcript or explain why the petitioner is unable to do so," the Defendant Ramos has failed to attached any certified copy of the transcript of any of the proceedings in the instant action which would constitute grounds for the filing of the Petition for Writ of Error Coram Nobis. Instead in the Petition for Writ of Error Coram Nobis, the Defendant Ramos essentially argues that negative media reporting of the circumstances of his criminal conviction constitutes sufficient and lawful grounds for the Petition for Writ of Error Coram Nobis. In Skok v. State 361 Md. at 67-68, 760 A. 2d 647 (2000), the Court stated:

"... by the decided weight of authority, however, the remedy is not broad enough to reach every case in which there has been an erroneous or unjust judgment, on the sole ground that no other remedy exists, but it must be confined to cases in which the supported error inheres in facts not actually in issue under the pleadings

at the trial, and unknown to the Court when the judgment was entered, but which, if known, would have prevented the judgment. Accordingly it is stated as a general rule that the Writ of Error Coram Nobis does not lie to correct an issue of fact which has been adjudicated, even though wrongly determined; nor for alleged false testimony at the trial; nor on the ground that a juror swore falsely as to his qualifications; nor for newly discovered evidence. . .”

In this case, the Defendant Ramos’s allegations concerning negative media attention concerning his case simply would not have prevented the Court from entering the judgment of conviction for the charge of harassment in this case, and thus the Defendant Ramos failed to state in his Petition for Writ of Error Coram Nobis sufficient grounds for the issuance of the Writ. For these reasons, the denial of the Defendant Ramos’s Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202, by both Judge Legum and Judge Johnson was proper.

Upon consideration of the foregoing, it is thereupon this 4th day of November 2013, by the District Court of Anne Arundel County ORDERED that the Defendant Jarrod Warren Ramos’s Motion for the Administrative Judge to Reassign Case and Revise Judgement is denied.



John P. McKenna, Jr.
Judge

cc:
Office of the State’s Attorney
Jarrod W. Ramos, Defendant
Judge Jonas D. Legum
Judge Megan B. Johnson

Copies mailed to all parties

11/04/13, by JDM
date initials

11/12/13

STATE OF MARYLAND

v.

JARROD WARREN RAMOS

* In the DISTRICT COURT of
MARYLAND for ANNE ARUNDEL
COUNTY in ANNAPOLIS

* Case No. 4A00231396

Motion for the Administrative Judge to Reassign Case and Revise Judgement

Jarrold W. Ramos petitions for the consideration of His Honor John P. McKenna, Jr. to recuse the Honorable Judge Megan B. Johnson and strike her judgement for irregularity:

1. The Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202 ("Petition") filed in the above-captioned action on January 30, 2013, is adopted by reference.

2. On February 7, 2013, Petitioner's fax copy of a copy of the first page of Petition and a cover letter addressed to the Clerk of this Court were forwarded to and denied by the Honorable Judge Jonas D. Legum. This judgement was entered on February 8, 2013.

3. On February 12, 2013, Petition and a cover letter addressed to the Clerk of this Court were forwarded to Judge Johnson, who ruled only by signing the letter, "Denied."

4. *This motion is supported by Petitioner's affidavit, **Exhibit A**.

5. *Included with the notice to Petitioner of Judge Johnson's denial was a redundant, highlighted printout, **Exhibit B**, which seems to convey the message, "Yes, your motion is really, truly denied. Please go away. Please stop calling us." Denied.

Petition is not a motion.

There has been a fundamental failure of this Court to observe that fact.

6. Rule 15-1201: "The Rules in this Chapter govern proceedings for a writ of *coram nobis* as to a prior judgment in a criminal action." "[A] writ of error *coram nobis* remains a civil action in Maryland, independent of the underlying action from which it arose." *Skok v. State*, 361 Md. 52, 760 A.2d 647 at 654 (2000) quoting *Ruby v. State*, 353 Md. at 678-9 (1999).

7. Rule 15-1203: the Clerk shall give prompt notice of Petition to the State. Rule 15-1204: this notice begins the 30-day period for the State to file a response.

8. *It appears this was never done. Petition is not a common, everyday filing, thus Petitioner's letter referencing Rule 15-1203. A week after filing Petition, Petitioner phoned the Clerk's office to confirm the date of notice. The existence and exact location of Petition were not even known. A supervisor conveyed to Petitioner he should have filed in the Circuit Court, *but see* Rule 15-1202(a) (File in the criminal action. The District Court has authority.).

9. *Petitioner has been similarly told, "That's just how we handle everything that comes in," *but see GM Corp. v. Seay*, 388 Md. 341, 879 A.2d 1049 at 1057-8 (2005) ("As we have said time and time again, the Maryland rules are 'precise rubrics,' which are to be strictly followed. Maryland case law is well settled on this issue." (internal citations omitted)).

Petitioner cannot receive a fair hearing from Judge Johnson.
This is already demonstrated.

10. Rule 15-1207(a): "The judge shall prepare and file ... a statement setting forth separately each ground on which the petition is based, the federal and state rights involved, the court's ruling with respect to each ground, and the reasons for the ruling."

11. *This was not done. The Court did not identify any grounds or rule that Petition presents no grounds. Petitioner is troubled that a District Court judge would sign an order to a document while ignoring its content—citation to the Maryland Rules, no less. This is even more disturbing given the gravity of Petition's allegations (highly sanctionable prosecutorial misconduct) and the rights involved (basic due process and fair trial before a jury).

12. Rule 15-1202(e): "Amendment of the petition shall be freely allowed when justice so permits." The Maryland Court of Appeals has decreed a competent *coram nobis* petition

presenting a colorable claim must be heard (*Skok, supra*). “[T]he court ha[s] broad discretion to grant or deny relief. We have made clear, however, that the court must exercise its discretion liberally, ‘lest technicality triumph over justice.’” *Williams v. Housing Authority*, 361 Md. 143, 760 A.2d 697 at 702 (2000) (citations omitted).

13. *It is patently wrong to dismiss Petition *sua sponte* without even noting a response. The State may wish to confess to the allegations and consent to the requested relief. If the Court finds a technical defect in Petition, the Court must grant leave to amend.

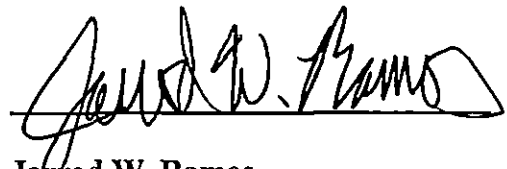
14. Rule 16-813, CJCR 2.6, Comment 1: “The right to be heard is an essential component of a fair and impartial system of justice.” Rule 16-813, CJCR 2.7: a judge has a responsibility to decide or recuse.

15. * Judge Johnson has dismissed Petition in a cursory manner and wrongly denied Petitioner his lawful right to be heard. This impropriety is insurmountable.

Wherefore, Petitioner respectfully requests this Honored Court:

- o Pursuant to Rule 3-505(b), disqualify Judge Johnson from this proceeding.
- o Reassign this proceeding to Administrative Judge McKenna.
- o Pursuant to Rule 3-535, strike the denial of Petition of February 12, 2013.
- o Commence and administer an action for Petition as prescribed by law.
- o Grant any other or further relief as this Court deems proper.

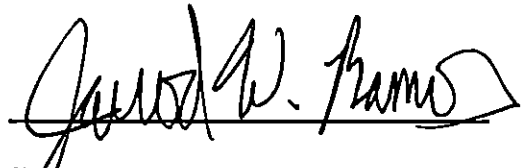
Sincerely submitted,

A handwritten signature in black ink, appearing to read "Jacrod W. Ramos", written over a horizontal line.

Jacrod W. Ramos
402 Armstrong Court, Apt. B
Laurel, MD 20707
301-604-4877

Certificate of Service

I do certify that on this 22nd day of February, 2013, I hand delivered a complete copy of this filing to the Anne Arundel County State's Attorney's Office at 251 Rowe Boulevard, Suite 332, in Annapolis, MD 21401.

A handwritten signature in black ink, appearing to read "Jarrod W. Ramos", is written over a horizontal line.

Jarrod W. Ramos

STATE OF MARYLAND

v.

JARROD WARREN RAMOS

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*

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In the DISTRICT COURT of
MARYLAND for ANNE ARUNDEL
COUNTY in ANNAPOLIS

Case No. 4A00231396

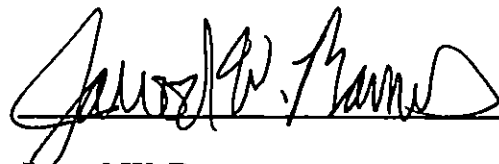
Petitioner's Affidavit

I, Jarrod W. Ramos, hereby set my name in affirmation of the following facts:

1. This paper is Exhibit A of the Motion for the Administrative Judge to Reassign Case and Revise Judgement ("Motion") filed in the above-captioned case on February 22, 2013.
2. Paragraphs 4, 5, 8, 9, 11, 13 and 15 of Motion are true, and each begins with a superscript asterisk. No falsity is implied by the omission of any paragraph.
3. Upon the grounds stated in Motion, I cannot receive a fair and impartial hearing of Petition from Judge Johnson.
4. Upon the grounds stated in Motion, I have already received an unfair hearing of Petition from Judge Johnson.
5. I can receive a fair and impartial hearing of Petition from Administrative Judge McKenna. He should grant this in the interests of justice and the furtherance of the practice and administration of law in the District Court of Maryland for Anne Arundel County.

I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information, and belief.

So sworn,



Jarrod W. Ramos
402 Armstrong Court, Apt. B
Laurel, MD 20707
301-604-4877

STATE OF MARYLAND

v.

JARROD WARREN RAMOS

*

*

*

In the DISTRICT COURT of
MARYLAND for ANNE ARUNDEL
COUNTY in ANNAPOLIS

Case No. 4A00231396

Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202

Jarrold W. Ramos, proven his integrity as a productive, law-respecting American, now directs this Honored Court's attention to the misdeeds and usurpers on the other side of this case:

1. The Defendant and Petitioner are one and the same. In the above-captioned action his person was subject to the judgement and sentence of this Court.
2. Trial was held in this Court on July 26, 2011. Petitioner pled guilty to and was convicted of one count: Harass; a Course of Conduct. He was fined \$500, costs included, and placed on 18 months of supervised probation. The Court suspended a 90-day jail sentence.
3. On November 14, 2011, the Court granted reconsideration and probation before judgement. On July 25, 2012, the State dismissed a fraudulently-alleged¹ violation of probation.

Untold Truth, Publicized Lies

4. *This petition is supported by Petitioner's affidavit, **Exhibit A**.
5. *On July 31, 2011, *The Sunday Capital* published an editorialized news column, **Exhibit B**, concerning Petitioner and his crime and promoting false, incriminating facts. Some of these statements were unsupported or even contradicted by the evidence in this case.
6. Citizens of Anne Arundel County inflamed, labeling Petitioner—by his first name—a “sicko” and “predator,” his offense “extreme” (Ex. B, pp. 3-4). “It sounds like this guy

¹ His Honor Paul Garvey Goetzke found there was nothing to even suggest Ms. Sondervan was entitled to the peace order that was used to justify the violation charged. Her success in District Court was aided by her perjured testimony. Petitioner procured a summons for such charges, which were dismissed by Assistant State's Attorney Michelle Smith on grounds of insufficient evidence before an investigation was even begun. Petitioner retains custody of his six-page, two-part application, which also details Ms. Smith's grossly unprofessional conduct.

willfully and maliciously harassed this woman for a very long time, all the while knowing he was committing a crime. A little jail time may have done him some good, since he seemed to think he was untouchable," one reader observed. The same person placed a police detective's extra-judiciary assertion of guilt with this Court's opinion. Another comment: "I appreciate the awareness that this column raises about stalking[.]" Stalking was never even charged.

7. *The Capital* boasted a circulation of over 38,000, "penetrating the Anne Arundel County market," and "serving 115,052 homes in and around the Annapolis area," **Exhibit C**.

8. At this same time, Petitioner retained the right to *de novo* appeal and jury trial. An acquittal on appeal would have been reasonably possible. Ms. Lori Sondervan ("Victim") is extremely impeachable and her selective production of evidence left a hole in the State's case.

9. *Victim's request to Petitioner, "Please don't contact me either," was never offered during discovery. The State only provided an earlier request (emphasis added): "Please stop sending me *nasty* [or *angry*] emails." Victim established a pattern of breaking periods of silence by sending Petitioner unsolicited yet highly sensitive personal information; to ignore him was not to warn him. She only blocked him on Facebook after applying for criminal charges.²

10. Petitioner's angry or nasty contacts with Victim were limited and temporally distant. An unbiased jury could have found persistence, an essential element, to be lacking.

A Column Courtesy of the Corrupt

11. The cause of this petition is also a consequence of the conviction. Petitioner has sued the publishers of the aforementioned column for defamation and false light invasion of privacy, certifying by affidavit that over half of the column's words belong to false and

² Ms. Sondervan offered as fact the implausible story she had blocked Petitioner, who then devised a way to send Facebook messages to her BlackBerry only. The real magic was concocted in her head.

defamatory statements. The publishers have no meritorious defense and are currently at risk of contempt and default for attempted fraud before the Circuit Court for Prince George's County.³

12. *Shortly before the reconsideration hearing on November 14, 2011, Petitioner had the following verbal exchange with his defense counsel, Christopher J. Drewniak:

Counsel: I thought about whether or not to bring [the news column] up. It's a double-edged sword. The downside is it might make the judge nervous.

Petitioner: You mean because he might worry he's under media scrutiny?

Counsel: Yes.

13. The severe prejudice and duress inflicted by this case's media exposure is even reflected in this Court's own words. On November 14, 2011, the Court advised, "I don't want to cost him his job with the federal government." On February 23, 2012, Petitioner submitted a motion to dismiss the impending violation of probation charge, attaching a copy of Exhibit B. After the dismissal of that charge on July 25, 2012, the Court was recorded quietly conversing:

The Court: I re... is that the case where he went to high school with the lady? [opens case jacket] Oh yeah, oh yeah [turns pages] Oh yeah! Probably hasn't had a date since high school. Can't understand why. [laughter] Bench warrant?

14. The State solicited and actively engaged the media in publicizing this case. After Petitioner was sentenced on July 26, 2011, the audio record captured the following exchange:

Virginia Miles for the State: Come with me. We're going to take a walk outside.

Victim: Hmm?

Unknown Assistant State's Attorney: Somebody from the news is here today.

Victim: Oh, no way!

Unknown Assistant State's Attorney: Yessss!

³ CAL12-22839, *Ramos v. Hartley*, is set for a motions hearing on February 15, 2013.

Victim: Oh my god.

Miles: Come on with me and I'll—you can talk to him.

15. *On May 1, 2012, Victim testified under oath that a news reporter was present during Petitioner's sentencing and admitted to giving an interview with that reporter.

16. *Grievance v. Gansler*, 377 Md. 656 (2003), is instructive on the fundamental dangers of prosecutorial collaboration with the press. Every American should understand and appreciate it. The Anne Arundel County State's Attorney's Office must cease bastardizing it.

My House in Order

17. Petitioner has not waived these allegations of error. He delayed this petition without prejudice to the State and with sound reason: to not delay would have prejudiced *him*.

18. *These allegations of error were unknown to Petitioner on July 25, 2012. § 8-401 of the Criminal Procedure Article: "The failure to seek an appeal in a criminal case may not be construed as a waiver of the right to file a petition for writ of error *coram nobis*."

19. "[T]he fact that the charges ... ultimately were resolved by PBJ does not deprive [one] of standing to petition for the writ." *Rivera v. State*, 180 Md. App. 693 at 708 (2008).

20. Petitioner's window for appeal is long closed. He has served his entire sentence and is ineligible for post-conviction relief. This petition is his only avenue to remedy.

21. Petitioner is entitled to a hearing by law. *Skok v. State*, 361 Md. 52 (2000).

A Source of Scourge

22. "Misconduct that violates the integrity of our Honored Courts makes a victim of those very Courts, which in turn makes a victim of us all" (Petitioner's records, **Exhibit D**, p. 6).

23. *On February 9, 2011, Petitioner sent an e-mail to aacsao@aacounty.org. The e-mail included "4A00231396" in the subject line. The body of the e-mail included the statement:

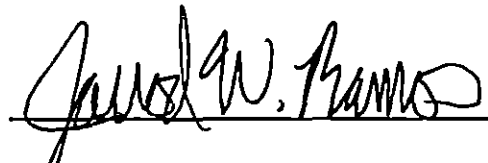
"If this goes to trial and I am forced to tell my side of the story, Mrs. Sondervan's mental health would be in even greater peril." Petitioner never received this e-mail through discovery.

24. The State so engaged in atrocity to deter Petitioner from appealing his conviction. They wanted to have their cake and eat it too, but this cake was poisoned, and now it is all gone. The rotted crumbs are soil in their filthy claws. As a cost their case must die.⁴

Wherefore, Petitioner respectfully demands by Constitutional right that this Honorable Court:

- o Strike Petitioner's guilty plea of July 26, 2011.
- o Vacate the sentence thereby imposed upon Petitioner.
- o Order reimbursement of the \$500 fine paid by Petitioner.
- o Dismiss case number 4A00231396.

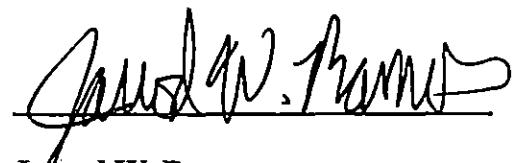
Sincerely submitted,



Jarrod W. Ramos
402 Armstrong Court, Apt. B
Laurel, MD 20707
301-604-4877

Certificate of Service

I do certify that on this 30th day of January, 2013, I hand delivered a complete copy of this filing to the Anne Arundel County State's Attorney's Office at 251 Rowe Boulevard, Suite 332, in Annapolis, MD 21401.



Jarrod W. Ramos

⁴ Petitioner has also referred this matter to the Attorney Grievance Commission.

RECEIVED

STATE OF MARYLAND

v.

JARROD WARREN RAMOS

* In the DISTRICT COURT of
* MARYLAND for ANNE ARUNDEL
* COUNTY in ANNAPOLIS
* DISTRICT COURT OF MD. A
* DISTRICT 7-1 ANNAPOLIS.
Case No. 4A00231396

Petitioner's Affidavit

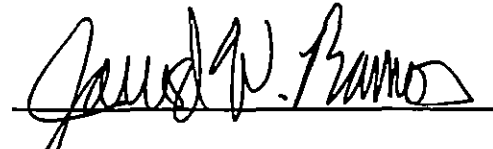
I, Jarrod W. Ramos, hereby set my name in affirmation of the following facts:

1. This paper is Exhibit A of the "Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202" filed in the above-captioned action on January 30, 2013.

2. Paragraphs 4, 5, 9, 12, 15, 18 and 23 of that Petition are true, and each begins with a superscript asterisk. No falsity is implied by the omission of any paragraph.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing paper are true.

So sworn,



Jarrod W. Ramos
402 Armstrong Court, Apt. B
Laurel, MD 20707
301-604-4877



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Eric Hartley: Jarrod wants to be your friend

By ERIC HARTLEY, Staff Writer
Published 07/31/11

If you're on Facebook, you've probably gotten a friend request or message from an old high school classmate you didn't quite remember.

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Sandusky Proclaims Innocence in NBC Interview



Lady Gaga Goes Pantless



Cain Accuser's Ex-boyfriend Corroborates Story

For one woman, that experience turned into a yearlong nightmare.

Out of the blue, Jarrod Ramos wrote and thanked her for being the only person ever to say hello or be nice to him in school.

She didn't remember him, so he sent pictures. She Googled him, found a yearbook and realized they apparently did go to Arundel High together.

He was having some problems, so she wrote back and tried to help, suggesting a counseling center.

"I just thought I was being friendly," she said.

That sparked months of emails in which Ramos alternately asked for help, called her vulgar names and told her to kill herself. He emailed her company and tried to get her fired.

She stopped writing back and told him to stop, but he continued. When she blocked him from seeing her Facebook page, he found things she wrote on other people's pages and taunted her with it, attaching screenshots of the postings to some of his emails.

She called police, and for months he stopped. But then he started again, nastier than ever.

All this without having seen her in person since high school. They never met until they came to court a couple of months ago.

Last week, Ramos, a 31-year-old federal employee, pleaded guilty in District Court to a misdemeanor harassment charge.

Judge Jonas Legum, who called his behavior "rather bizarre," suspended a 90-day jail sentence and placed him on probation, ordering him to continue in therapy and not contact the victim or her family in any way.

The case is extreme. But it provides a frightening look at the false intimacy the Internet can offer and the venom that can hide behind a computer screen.

"I read about this all the time, where Facebook conversations, email conversations, start out fine and then take a turn where they become nastier over the course of time," said Ramos' lawyer, Christopher Dreniak. "And this is apparently one of those situations."

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The victim, who asked that her name not be printed, said she lived in fear for her safety for months.

The emails started in late 2009 or early 2010 - she can't remember exactly, because it was only a few months later that they grew disturbing and she started documenting things.

At first, she felt bad for him, so she shared some personal information and offered advice.

"But when it seemed to me that it was turning into something that gave me a bad feeling in the pit of my stomach, that he seems to think there's some sort of relationship here that does not exist ... I tried to slowly back away from it, and he just started getting angry and vulgar to the point I had to tell him to stop," she told the judge.

"And he was not OK with that. He would send me things and basically tell me, 'You're going to need restraining order now.' 'You can't make me stop. I know all these things about you.' 'I'm going to tell everyone about your life.' "

An email in April 2010 said, "Have another drink and go hang yourself, you cowardly little lush. Don't contact you again? I don't give a (expletive). (Expletive) you."

Later that month, the woman was suddenly put on probation at the bank where she worked. She said a supervisor told her it was because of an email from Ramos and a follow-up phone call in which he advised them to fire her.

She said she was laid off in September and believes, but can't prove, it was because of Ramos. She's since gotten another job.

When she learned what Ramos had done, she called police. He stopped contacting her for a while and started counseling in November. Still, the silence was not comforting.

"That just left me to feel like he was stewing," she said. "For all that time he was silent, he's collecting things about me. And then comes back at me, like, 10 times worse than he had before."

The messages resumed in January, referring to friends' Facebook profiles and postings about her and about Ramos himself.

His messages rambled, calling her "a bipolar drunkard leading a double life" and saying "Expletive you, leave me alone" though she hadn't written to him in months. He told her she was afraid to let a man get close to her and discussed her family, friends, job and Rotary Club involvement - all information gleaned from the Internet.

In January, the victim went to court to get a peace order and file charges. Finally, he stopped for good.

Ramos, a tall, thin man with long hair he wears in a ponytail, did not speak at the hearing and did not return a call for comment left with his attorney.

He has a degree in computer engineering and has worked for the U.S. Bureau of Labor Statistics for six years, Drewniak said. He had no previous criminal record.

Detective Rob Cremen, who handles domestic violence cases in the county police Southern District, said sustained harassment like this is rare.

Facebook and networks like it offer the chance to reconnect with old friends. But they also can invite unwanted attention. Many people don't realize how much information about them is on social networking sites and elsewhere on the web.

"It's kind of a double-edged sword," Cremen said.

Read Eric Hartley's "Arundel Outtakes" blog at www.hometownannapolis.com/blogs.

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Take a look at a summary of Commenting Guidelines.

Defendant's response - 2011-11-14 23:30:17

Report Abuse or Vote 0 0 0

Dear Reader,

If you're here now, you probably just Googled my name. If this story caught you off guard, there's something you should know. While I did commit the offense of harassment, the victim's version of events is a gross misrepresentation of what actually occurred. Mr. Hartley has here further distorted the truth.

Upon reconsideration this afternoon, Judge Jonas D. Legum has overturned my conviction despite continued opposition by the victim. At hearing she showed her true colors and the court was unpersuaded by her attempted manipulation. If you know me, ask me. I certainly did a bad thing, but don't shun me for how it was portrayed by this newspaper.

Mr. Hartley,

This is your written notice the conditions I provided to you are hereby withdrawn. You have chosen to ignore my letter, but your response was not invisible. The ground you tried digging was solid, as my integrity. Say the same to me and you've lied once more. You can expect my lawsuit in July. Get your people ready, because I will be.

CC: ehartley@capitalgazette.com

Jarrod Ramos - , - Karma: Neutral

@Jim - 2011-08-04 14:31:52

Report Abuse or Vote 1 0 1

How about about the Internet and communication technology in general?

If God had wanted instant access to everything about everyone, He would have given us all ESP.

(LOL)

John Munroe - Annapolis, MD - Karma: Excellent

I should have said... - 2011-08-02 19:28:05

Report Abuse or Vote 0 0 2

All victims, as I recognize that it's likely not only women that find themselves on the receiving end of this type of harassment.

Kathryn Hewitt - , - Karma: Neutral

This is no joke... - 2011-08-02 19:23:08

Report Abuse or Vote 0 0 3

And there is no one to blame here but the harasser. Like it or not, our information is out there, whether we put it there or not.

BS if I've ever read it:

"I read about this all the time, where Facebook conversations, email conversations, start out fine and then take a turn where they become nastier over the course of time," said Ramos' lawyer, Christopher Drewniak. "And this is apparently one of those situations."

Judge: "Rather bizarre"

Detective: "sustained harassment like this is rare"

Just look at the things he said to her. Facebook didn't make him say and do those things, neither did any other part the Internet.

It sounds like this guy willfully and maliciously harassed this woman for a very long time, all the while knowing he was committing a crime.

A little jail time may have done him some good, since he seemed to think he was untouchable.

More women need to stand up for themselves.

Kathryn Hewitt - , - Karma: Neutral

We will someday come to learn... - 2011-08-02 17:53:51

Report Abuse or Vote 2 0 3

...that Facebook was the end of civilization as we knew it.

Jim Denora - Annapolis, MD - Karma: Excellent

@Julia - 2011-08-02 17:09:22

Report Abuse or Vote 4 0 1

You're right...and then, you're wrong.

The Internet and its social media get you OUT THERE, allowing you opportunities, including the chance of being seen by more people, and having nuggets of "useful" information about you and your associations immediately available to many more potential predators.

Jarrod might have totally forgotten about this young lady after high school graduation otherwise.

I don't think anyone EXCEPT the harassers themselves and their defense attorneys want to "blame the Internet" and let these sickos off the hook.

#8 - The Watchdog: Jeep driver scared of uncontrollable shaking

#9 - Police Beat: Men hospitalized after car flips over

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#4 - Police Beat: Men hospitalized after car flips over (16 comments)

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Raejean French - Severn, MD - Karma: Good

letting harassers off the hook - 2011-07-31 18:39:30 Report Abuse or Vote 0 4

Victims feel like they are at fault because of the attitudes that are unfortunately on display in Eric Hartley's otherwise good column. The problem is not that naive people "don't realize how much information about them is on social networking sites" or are lured by the "false intimacy the Internet can offer." All Jarrod needed was the victim's name and his knowledge of her from high school to initiate his harassment. Notice that it's HIS lawyer who casts the problem as one of "Facebook conversations, email conversations [that] take a turn where they become nastier", as if it's the Internet that's to blame rather than the harasser. I appreciate the awareness that this column raises about stalking and harassment, but turning this into a cautionary "be careful what you put online" tale only lets harassers off the hook.

Julia L. - Karma: Neutral

You're Right - 2011-07-31 14:48:24 Report Abuse or Vote 0 1

I think most people are fairly trusting and think things like this only happen in Lifetime movies. Do you know if she ever contacted authorities, or if/ why he finally left her alone?

Karen G - Annapolis, MD - Karma: Excellent

Folks don't think about this - 2011-07-31 14:18:46 Report Abuse or Vote 1 2

The big down side to the social networking sites specifically geared toward dating is that local "matches" you spurn can easily find you and stalk you if they so choose.

You might end up finding your nightmare instead of your dream date.

Unlike Facebook, which at least gives some passing consideration to member privacy, the dating and matchmaking sites actually encourage you to divulge information made available to their entire membership in order to determine your compatibility and common interests. A photo or photos are also involved.

Let me just say a young female family member had a tense time for a while with a rejected would-be Romeo who let her know he knew (being a local he recognized from her picture, not because she divulged an address) exactly where she was and could "get" her any time he wanted.

Raejean French - Severn, MD - Karma: Good

Wow - 2011-07-31 12:10:45 Report Abuse or Vote 0 4

This makes me wonder how common this type of harassment actually is, but goes unreported because the victim is too afraid or somehow feels at fault. The daughter of a friend of mine experienced something similar, though not even close to this extreme, and neither the police, nor the County Commissioner would do anything about it, not even let her file for a peace order, because they said she couldn't show that she was in any "imminent danger." Thankfully for her, it did eventually stop. Kudos to this woman for standing up for herself and seeing it through. It couldn't have been easy.

Karen G - Annapolis, MD - Karma: Excellent

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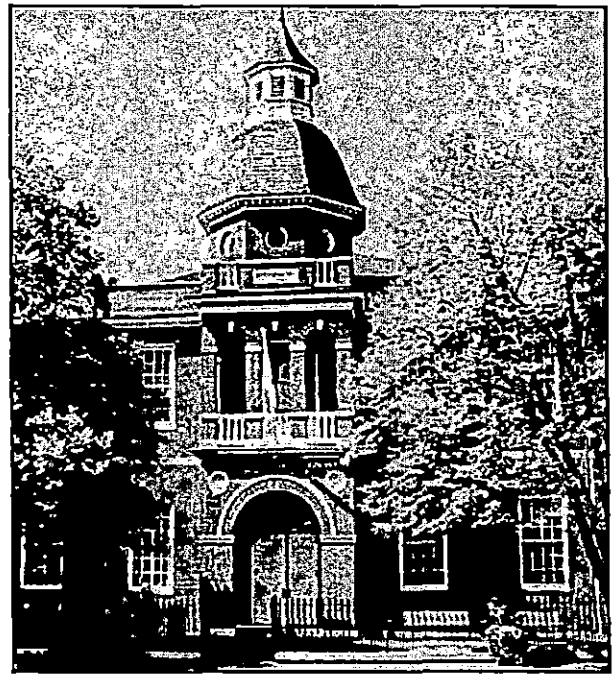
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DISTRICT COURT
CASE NUMBER

RELATED CASES:

0701SP004462012

02C12168912

4A00231396

COMPLAINANT

DEFENDANT

Jarrod W. Ramos

Printed Name

402 Armstrong Court, Apt. B

Number and Street Address

Laurel, MD 20707

City, State, and Zip Code

301 604 4877

Telephone

Lori Michelle Sondervan

Printed Name

1590 Star Pine Drive

Number and Street Address

Annapolis, MD 21409

City, State, and Zip Code

443 995 5041

Telephone

Agency, sub-agency, and I.D. #

(Officer Only)

CC#

DEFENDANT'S DESCRIPTION: Driver's License#

Sex F Race W Ht 5' 6" Wt 140

Hair Br/Bl Eyes Br Complexion Other D.O.B 10/13/79 ID

APPLICATION FOR STATEMENT OF CHARGES

Page 1 of 16 SWR

I, the undersigned, apply for statement of charges and a summons or warrant which may lead to the arrest of the above named Defendant because on or about February 24, 2012, at a hearing in case 0701SP004462012, after previously speaking multiple unsworn lies in the Court of His Honor Jonas D. Legum, the above named Defendant engaged in perjurious conduct in the Court of His Honor Thomas J. Pryal.

(Concise statement of facts showing that there is probable cause to believe that a crime has been committed and that the Defendant has committed it): She knowingly told lies pertaining to a material issue and deliberately mislead Judge Pryal so as to rule in her favor. On appeal in the Court of His Honor Paul Garvey Goetzke, she perpetuated her perjury unsuccessfully and her accusations were ruled to be baseless. While not all of this can be proven beyond a reasonable doubt, I have a certified transcript of the above referenced hearing evidencing a violation of Maryland CRIMINAL LAW Article § 9-101(c) as follows:

(Continued on attached 15 SWR pages) (DC/CR 1A)

I solemnly affirm under the penalties of perjury that the contents of this Application are true to the best of my knowledge, information and belief.

Date

Officer's Signature

I have read or had read to me and I understand the Notice on the back of this form.

Date

Applicant's Signature

Subscribed and sworn to before me this 19th day of

Time: 9:00 A M

Judge/Commissioner

I understand that a charging document will be issued and that I must appear for trial on at , when notified by the Clerk, at the Court location shown at the top of this form.

☐ I have advised applicant of shielding right. ☐ Applicant declines shielding.

☐ I declined to issue a charging document because of lack of probable cause.

Date

Commissioner

ID

TRACKING NUMBER



DISTRICT COURT OF M

LAND FOR Anne Arundel County - C Burnie

(City/County)

LOCATED AT (COURT ADDRESS)

7500 Ritchie Highway

Glen Burnie, Maryland 21061-3756

DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, M.I.)

Sondervan, Lori Michelle

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 2 of 3

In case 0701SP004462012, Defendant argued—under oath—for a peace order, alleging harassment through my personal Verizon website. When prompted by the Court for clarification, Defendant testified, "Well, somebody else found [the website] and sent it to me," ("Fact 1"). Perceiving this statement to work contrary to her desired outcome, she immediately altered her representation of fact. She then claimed she found my website firsthand as a result of activity on Twitter, because I allegedly posted to the "Twitter feed" of Eric Hartley, @ethartley, which she allegedly did subscribe to but does not anymore. She testified the Twitter activity was not posted or sent to her by Mr. Hartley. Finally, she forcefully proclaimed, "No, Mr. Ramos, I'm saying YOU posted your website on Eric Hartley's Twitter feed!" ("Fact 2").

Fact 1 and Fact 2 are contradictory, logically inconsistent, and mutually exclusive in the context they were asserted. As testified by Defendant, Fact 1 and Fact 2 both recounted her initial receipt of allegedly harassing communications, and this is impossible. I subjected Defendant to a cross-examination which clarified her revised position, and she cannot explain this crime as a product of confusion, ambiguity, or mistake. Persuaded by Defendant's manipulation, the Court ruled, "[B]y placing certain things on websites where they can be seen by the general public, not just your own personal website ... I'm satisfied that there's clear and convincing evidence that you've committed the act of harassment against [Defendant]."

Furthermore, Defendant was never subscribed to @ethartley during the time period in question (November 14, 2011, to February 24, 2012), and this can be proven by the Twitter Log Data generated by her own account, @lsondervan, which Twitter maintains for 18 months. @lsondervan is apparently dormant, with only 1 "tweet" and a portrait photographed no later than 2009, but is subscribed to 15 other Twitter users. I have personally seen this list of 15 "Twitter feeds" in

Date

Applicant's Signature

TRACKING NUMBER



LOCATED AT (COURT ADDRESS)

7500 Ritchie Highway

Glen Burnie, Maryland 21061-3756

DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, M.I.)

Sondervan, Lori Michelle

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 3 of 3

2011, and am certain @ethartley was not included at that time. Defendant's testimony that she subscribed to @ethartley but does not anymore was material as a foundational element of Fact 2.

As a result of Defendant's perjury, I have—in spite of my strict adherence to the conditions of my probation—again been threatened with jail and the ruination of my career, which Judge Legum has explicitly stated on record he does not want to occur. This desired revenge, which has been denied in a coordinated manner before Judge Legum by both the AASAO and Defendant, is the exact motive for her perjury. But I also understand she is a severely troubled person, and that's why I'm not interested in punishment. There is, however, no redemption for willful and knowing mens rea, and I care a great deal about Truth. While Defendant will remain a trained and practiced liar, her statements must not defile our Courts any further. So let Truth be known and let Lori Michelle Sondervan be convicted a perjurer for the remainder of her lifetime.

Date

Applicant's Signature

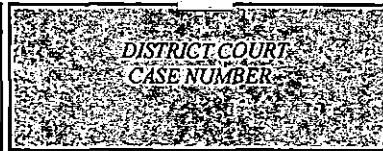
TRACKING NUMBER



LOCATED AT (COURT ADDRESS)

7500 Ritchie Highway

Glen Burnie, Maryland 21061-3756



DEFENDANT'S NAME (LAST, FIRST, M.I.)

Sondervan, Lori Michelle

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 4 of 6

ADDENDUM

The previous pages are my same complaint as filed in case 6A00253896 on July 13, 2012. It is also appropriate a charge be brought under CR.9.101.(a) for Defendant's willfully and corruptly false testimony she did subscribe to @ethartley on Twitter but does not anymore ("Fact 3"). Defendant's material allegation that she was harassed through Eric Hartley's Twitter feed is not possibly true without Fact 3 also being true.

At 10:05 on the morning of July 18, 2012, I received a voice message from "Maria" with the AACSAO, 410-260-1886 direct line, informing of the dismissal of case 6A00253896 for reasons of insufficient evidence. She stated this dismissal was entered as part of their standard screening process by Michelle Smith, Chief of District Court in the AACSAO, who reports directly to State's Attorney Frank R. Weathersbee. I personally spoke with Ms. Smith that afternoon, and based on our conversation understand she believed Fact 1 and Fact 2 do not satisfy the materiality element of perjury.

I explained to Ms. Smith that the controlling case law as to materiality in a perjury case is Palmisano v. State (124 Md. App. 420), but she replied that she had other work to do and did not have the time to review this reported opinion. I then cited to her that Palmisano defines materiality as when "[T]he false testimony could have affected 'the course or outcome' of the proceeding." Ms. Smith responded that Fact 1 and Fact 2 do not satisfy materiality in this case because they are not material to the granting of a peace order, because they are not material to a finding of harassment, because how a person allegedly comes to be harassed is not material.

Date

Applicant's Signature





LOCATED AT (COURT ADDRESS)

7500.Ritchie Highway

Glen Burnie, Maryland 21061-3756

DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, M.I.)

Sondervan, Lori Michelle

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 5 of 6

I pointed out to Ms. Smith that Judge Pryal cited Fact 1 and Fact 2 in his ruling. She claimed that I, and, by implication, the signing Commissioner in case 6A00253896, misunderstand what His Honor meant, even though I am intimately familiar with the facts of this case and Ms. Smith had admittedly not yet even received the case transcript, much less read it. When I inquired how Ms. Smith could dismiss this charge without even knowing the related facts, she nonresponsively expressed that she was satisfied with the correctness of her decision. She then stated that the dismissal of case 6A00253896 was already entered.

I offered that if I could elucidate her mistake I could then refile this complaint. I further pointed out to Ms. Smith that Fact 1 and Fact 2 are indeed material to a finding of harassment, which under CR.3.803(a)(1) includes a necessary element of intent to harass, alarm, or annoy. In light of this, how a person allegedly comes to be harassed is unquestionably material. Because Ms. Smith did not dispute any of this, and because she inferred this complaint is otherwise legitimate (at one point she even conditionally stated that Defendant is harassing me), I am refiling this charge.

Ms. Smith also made some very bizarre comments to me. She expressed that I am an intelligent man who has learned enough to "come right up to the line [of harassment] without crossing it," but as Judge Goetzke has found as fact, since my original offense I have come nowhere near to engaging in harassment. She advised I should forget Defendant exists, though this is of course impossible when she is maliciously engaging in my frivolous attempted prosecution. Ms. Smith suggested I am obsessed with Defendant and should seek psychiatric treatment, though it is mind-boggling how she could reach such an opinion when she is admittedly uninformed regarding the applicable history. Indeed, at one point Ms. Smith did express to me that her health was suffering because she was in need of water. Given the severe heat and

Date

Applicant's Signature

TRACKING NUMBER



LOCATED AT (COURT ADDRESS)

7500 Ritchie Highway

Glen Burnie, Maryland 21061-3756

DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, M.I.)

Sondervan, Lori Michelle

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 6 of 6

accompanying weather advisories on July 18, 2012, it is very understandable if Ms. Smith was impaired as a result of dehydration.

I believe Ms. Smith has acted with very poor judgement in this matter, due to the hectic and stressful nature of her sworn duties. Now that she has had an opportunity to consider her error, familiarize herself with the facts of this case, and review the applicable law, I look forward to a proper and professional prosecution of this very serious crime. Misconduct that violates the integrity of our Honored Courts makes a victim of those very Courts, which in turn makes a victim of us all.

Date

Applicant's Signature

TRACKING NUMBER

2012 FEB 24 A 1-13

DIST. COURT
DIST. 7 ANNAPOLIS

Legum

STATE OF MARYLAND

IN THE DISTRICT COURT OF
MARYLAND FOR ANNE ARUNDEL
COUNTY LOCATED AT ANNAPOLIS

v.

JARROD WARREN RAMOS

CASE NO. 4A00231396

* * * * *

**DEFENDANT'S MOTION FOR CLARIFICATION OF CONDITION OF PROBATION
AND FOR DISMISSAL OF VIOLATION OF PROBATION**

Jarrold W. Ramos ("Defendant"), by and through his own means and initiative, petitions for the consideration of His Honor Jonas D. Legum and in support thereof states as follows:

The No Contact Order

1. Defendant appeared before the Court on July 26, 2011 and pleaded guilty to one count of harassment. Defendant was found guilty, sentenced to a fully suspended 90 days, and immediately placed on 18 months of supervised probation. As special condition of probation, Defendant was ordered: "Have no contact with Lori Sondervan or family."

2. Defendant has intended and endeavored to abide by all conditions of his probation in absolute good faith. Defendant recognizes the supreme importance of the Court's no contact order, perhaps only overshadowed by the standard condition: "Obey all laws..."

3. Defendant understands the Court's no contact order to include both direct and indirect contact. Prior to the Court imposing sentence, Assistant State's Attorney Virginia Miles requested no contact "...through her friends, through her work, e-mails, texts, carrier pigeons, smoke [signals], anything, with the victim and her family" (the words spoken were "smoke screens," reasonably assumed to be in error). Defendant understands the Court's no contact order to include this requested standard.

*Denied - there is no VAP
changed in this case
7/4
3/11/h*

4. Defendant does not understand the Court's minimum standard of fault for finding a violation of the no contact order. Certainly, to preclude the possibility of a violation caused by third parties whose actions are entirely beyond Defendant's ability to anticipate or control, there must be at least an element of either intent or negligence. If a newspaper reporter contacts Lori Sondervan ("Victim") and speaks Defendant's name—all without Defendant's intent, direction, knowledge, or ability to reasonably anticipate—has contact occurred? If an employee, agent, or representative of a healthcare provider contacts Victim and speaks Defendant's name—all without Defendant's intent, direction, knowledge, or ability to reasonably anticipate—has contact occurred?

5. The hyperbolic "carrier pigeons and smoke signals" standard introduces ambiguity to the Court's order. Indeed, even carrier pigeons and smoke signals are intentional forms of communication, directed at an intended recipient(s). A carrier pigeon may be released unintentionally, but in such case would still not be expected to travel to a never intended recipient. If this pigeon unpredictably carries somebody's message to a third party, has contact occurred? Smoke signals are not released without intent. Smoke signals are indeed witnessed by those other than the intended recipients, but, by design, only communicate a meaning to the intended recipients. If a person witnesses a smoke signal but does not understand the meaning, has contact occurred?

6. Defendant appeared before the Court on November 14, 2011 for reconsideration. The Court struck its prior guilty verdict and granted probation before judgement. Before ruling, the Court stated, "...but I don't want to cost him his job with the federal government." Defendant

acknowledged his understanding of the Court's warning, "...if he violates he'll do the 90 days—it's that simple..."

Prelude to the Alleged Violation of Probation

7. On Sunday, July 31, 2011, *The Capital* newspaper printed columnist Eric Hartley's article "Jarrod wants to be your friend," **Exhibit A**. This publication contains a multitude of unprivileged statements that are both false and incredibly defamatory. After consulting with attorneys regarding civil tort action, Defendant determined only a pro se approach would be economically feasible.

8. On September 7, 2011, Defendant mailed a letter to Mr. Hartley, **Exhibit B**, return receipt requested, **Exhibit C**, which concluded, "If these conditions are not met, you and your employer will be facing another defamation suit in the Circuit Court of Maryland." Defendant is entirely capable of successfully executing such an endeavor. Since that time, Defendant has been almost wholly focused on and dedicated to preparing for this action. Defendant has learned the full extent and merits of his claim are much greater than first realized. In response, Capital-Gazette Communications have already retained attorney Robert C. Douglas of DLA Piper.

Contacts with Oasis

9. Defendant was a patient of Sandra O'Neill ("Therapist"), LCPC, at Oasis the Center for Mental Health ("Oasis") in Annapolis from January 5, 2010, to February 17, 2010. Victim was a subject of discussion during some of these visits. On one occasion, Defendant printed several pages of the e-mails exchanged between Victim and Defendant, brought them to his appointment, and left them with Therapist.

10. Defendant's criminal defense attorney did not request these e-mails because they were deemed not relevant and not worthy of the Court's attention in light of Defendant's guilt. As to Defendant's pending action against *The Capital*, the e-mails are not only relevant but also valuable to proving his claim.

11. To that end, Defendant visited Oasis on November 14, 2011, to inquire if the e-mail printout was present in his file. Defendant was instructed to submit a records request form. Defendant did not do so at that time to avoid being late for his scheduled reconsideration hearing. Oasis advised the form cannot be mailed; it must be submitted in person.

12. Defendant returned to Oasis on December 29, 2011, to submit his request, **Exhibit D**. Defendant was instructed to note his special interest in e-mail printouts and so did. Oasis advised, both verbally and in writing, that Defendant would receive a phone call regarding his request within 10 days. Oasis advised records must also be received in person, and payment is collected at that time.

13. Defendant telephoned Oasis on the morning of January 27, 2012, to inquire as to his request, which Oasis had not yet responded to. The receptionist (name unknown at this time) mistakenly read to Defendant the reviewing doctor's answer, to the effect of: Defendant's file may be released, but the special request needed approval of "CSC." The receptionist stated, "I guess you know what that is," and after Defendant replied, "Actually, no. CSC?" the receptionist balked, "Oh, I wasn't supposed to tell you that. I'm new here. All I can say is the request is not approved." Defendant asked if the request was denied and told again, "I can only say it's not approved." Defendant asked if there was someone he could speak to, as the receptionist had already acknowledged the undue delay processing the request. The receptionist

advised Defendant to speak with Therapist, and offered to take a message. Defendant left his phone number and stated the request was in regards to a pending lawsuit, and, while not urgent, was important.

14. Defendant returned to Oasis on Thursday, February 16, 2012, to inquire as to his request, which had again not been responded to. Defendant was told at that time his request had been denied. Defendant pointed out the denial only pertained to the e-mail printouts, as the reviewing doctor had already approved the remainder. Defendant additionally pointed out the non-responsive handling of his request by Oasis had not been appropriate, and that Defendant still has rights under federal HIPPA and Maryland law, even in the event of a denied request. Defendant spoke with the manager (name unknown at this time), who said she would follow up with Therapist and call Defendant on the following Tuesday.

15. On knowledge and belief, Therapist read the column regarding Defendant at the time of publication. On knowledge and belief, that column is the reason for the mishandling of Defendant's records request. Since January 27, 2012, Defendant has considered this incident to be damages to be claimed against *The Capital*. Prior to these criminal charges, Therapist was already aware of Defendant's harassment of Victim in 2010, was clinically familiar with Defendant, and was unhesitant to grant Defendant access to his medical records at Oasis.

16. Defendant's current counselor previously stated that Therapist could throw away the requested e-mail printouts. With that in mind, Defendant telephoned Oasis within a few hours of his visit of paragraph 14. Defendant expressed he would like to speak with Therapist, reiterated his concerns of paragraph 14, and non-specifically stated his concerns of paragraph 15. The receptionist (identity known, name unknown at this time) attempted to strong arm Defendant into

prematurely concluding his message. Defendant resisted, concluding, "Most importantly, to protect my interests, those e-mails are not to be destroyed."

17. On February 22, 2012, Defendant received by certified mail, return receipt requested, a copy of his medical records at Oasis, absent the lawfully denied e-mail printout. This mailing was postmarked February 21, 2012, **Exhibit E**.

18. At no point during Defendant's contacts with Oasis did any individual claim harassment or request Defendant to cease contact. Every given indication was that Defendant needed to speak with Therapist. There was no malice in any of these contacts, and the sole purpose was to gather documentation in preparation for action against *The Capital*. The information within those documents is already entirely known to Defendant.

The Alleged Violation of Probation

19. On February 17, 2012, Defendant received a phone call from Agent Kelly Thomas-Crosby, indicating he had violated the Court's no contact order. Defendant is presently unaware of the specific actions taken by Oasis employees, agents, or representatives, but reasonably assumes they initiated contact with Victim. In this case, such action was entirely taken without Defendant's intent, direction, knowledge, or ability to reasonably anticipate.

20. On February 17, 2012, Victim applied for and received a temporary peace order against Defendant, based on the same allegations, accusing harassment and stalking. The burden of proof for a temporary peace order is only *reasonable suspicion*. Defendant intends to contest the final peace order on February 24, 2012, and demonstrate the case against him does not even meet a standard of probable cause, much less clear and convincing evidence.

21. Defendant is, unsurprisingly, routinely faced with a skeptical response to his proposed pro se action against *The Capital*. Defendant's cause of action is not frivolous in the least, will be seeking a seven-figure punitive judgement to discontinue the tortfeasors' pattern of misconduct, and is unequivocally not a contrived vehicle for new harassment of Victim. Victim's incidental involvement will receive all protections of the law, and her rights will be carefully observed at all times. Defendant has considered, and is not averse to, recruiting an attorney-coach who would personally conduct all matters directly involving Victim.

22. Defendant recognizes it is critical the Court accepts Defendant's cause of action as legitimate and its pursuit as sincere. Defendant spent the entire morning of February 16, 2012—prior to visiting Oasis—at the Maryland State Law Library. During this time, Defendant read and took notes on, **Exhibit F**, the entire Maryland section of MLRC 50-State Survey: Media Libel Law 2011-12. Anticipating a stalking charge on the current peace order, Defendant returned on February 21, 2012, and obtained a signed statement from Shirley C. Aronson, **Exhibit G**, affirming his presence during the alleged stalking. Currently present in the civil file room of the Circuit Court for Anne Arundel County is the case file for 1998's *Greiber v. Capital Gazette Communications, Inc.*, **Exhibit H**, because Defendant requested it from storage. It is eight binders thick. Defendant intends to hire a forensic linguist to appear as an expert witness. Defendant asserts he is more knowledgeable of defamation law than most licensed attorneys.

Prayer for Relief

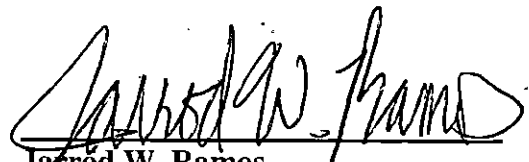
Wherefore, Defendant requests:

A. The Court provide a written opinion identifying the minimum standard(s) of fault constituting a violation of the order: "Have no contact with Lori Sondervan and family."

B. The Court dismiss any pending, proposed, or active violation of probation proceeding arising from Defendant's contacts with Oasis, or, in the alternative, the Court not issue a bench warrant in any such matter and allow Defendant to answer the allegations against him by writ of summons.

C. The Court shield this motion and all attached exhibits from public view or inspection due to their sensitive nature to Victim and Defendant, as well as potential media interest.

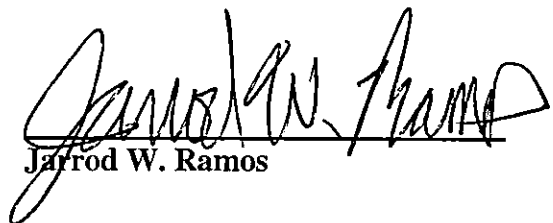
Respectfully submitted,



Jarrod W. Ramos
402 Armstrong Court, Apt. B
Laurel, MD 20707
301-604-4877

Certificate of Service

I, the above named Defendant, do certify that on February 23, 2012, a copy of this motion and all attached exhibits was hand delivered to the Anne Arundel County State's Attorney's Office at 251 Rowe Blvd., Annapolis, MD 21401.



Jarrod W. Ramos

402 Armstrong Court, Apt. B
Laurel, MD 20707
January 30, 2013

Tamera L. Chester
251 Rowe Boulevard
Annapolis, MD 21401

Madam Clerk:

Please find enclosed my "Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202" for filing in case number 4A00231396. Pursuant to rule 15-1203, please promptly notify the State's Attorney that the petition has been filed and the case number of the criminal action to which the petition relates.

Thank you,

Jarrod W. Ramos

Denied
76
2/7/13
cc: def SAO
2/8/13

2013 JAN 30 A 9 43

402 Armstrong Court, Apt. B
Laurel, MD 20707
January 30, 2013

Tamera L. Chester
251 Rowe Boulevard
Annapolis, MD 21401

RECEIVED

2013 JAN 30 A 9:48

STRICT COURT OF MD
DISTRICT 7-1: ANNAPOLIS


Madam Clerk:

Please find enclosed my "Petition for Writ of Error Coram Nobis Pursuant to Rule 15-1202" for filing in case number 4A00231396. Pursuant to rule 15-1203, please promptly notify the State's Attorney that the petition has been filed and the case number of the criminal action to which the petition relates.

Thank you,


Jaryod W. Ramos

cc: def
2/12/13


FEB 12 2013



DISTRICT COURT OF MARYLAND FOR ANNE ARUNDEL COUNTY

Located at 251 ROWE BOULEVARD, ANNAPOLIS, MD 21401

Case No. 4A00231396

STATE OF MARYLAND VS. RAMOS, JARROD WARREN

402 ARMSTRONG COURT APT. D
LAUREL MD 207070000

CC #: SID: LocID:
Eyes: BRN Hair: BRN Height: 6'00' Weight: 180 lb.
Race: 2 Sex: M DOB: 12/21/1979 DL #:

DEFENDANT PROBATION / SUPERVISION SUMMARY

The Court's finding is as follows:

Your probation will be SUPERVISED by the Division of Parole and Probation.

You must follow all probation/supervision conditions described below:

Standard Conditions :

1. Report as directed and follow your Supervisor's lawful instructions.
2. Pay P&P Supervision Monthly Fee of \$50.00 - waived.
3. Work or attend school regularly as directed.
4. Get permission from your Supervisor before: changing your home address, changing your job, leaving the State of Maryland, owning, possessing, using or having under your control any dangerous weapon or firearm of any description.
5. Obey all laws and incur no serious motor violation.
6. Notify your Supervisor at once if charged with a criminal offense and/or jailable traffic offenses.
7. Permit your Supervisor to visit your home unannounced.
8. Do not illegally possess, use, or sell any narcotic drug, controlled substance or related paraphernalia.
9. Appear in court when notified to do so.

Special Conditions :

10. Pay all fines, costs, restitution, and fees as ordered by the Court.
11. Totally abstain from alcohol and abusive use of any drug.
12. Submit to alcohol and other drug testing as directed by your Supervisor and pay any required costs.
23. Submit to evaluation and attend counseling for psychiatric or psychological treatment.
24. Have no contact with LORI SONDERVAN.

Other Conditions :

MAY LEAVE THE STATE OF MD.
COURT SATISFIED W/CURRENT COUNSELLING

Your first appointment with the Supervising Agency is JUL 26 2011 and the place to report is

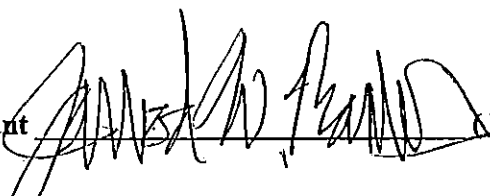
Division of Parole and Probation

251 ROWE BLVD, ANNAPOLIS, MD 21401

I have read, or have had read to me, the above conditions of probation. I understand these conditions and agree to follow them.
I understand that if I do not follow these conditions, I could be returned to Court charged with a violation of probation.

07/26/2011

Defendant

 (RAMOS, JARROD WARREN)



**DISTRICT COURT OF RYLAND
PROBATION/SUPERVISION DOCKET**

IT IS ORDERED THAT DEFENDANT:

- ☐ Be Unsupervised
☒ Be Supervised by: ☒ P&P ☐ Sexual Offender Management Team
☐ ACS: ☐ TASC ☐ HR ☐ DLLR

A. Standard Conditions: ☒ ALL Standard Conditions

1. Report as directed and follow your Supervisor's lawful instructions.
2. Pay P&P Supervision Monthly Fee of \$25.00.
3. Work or attend school regularly as directed.
4. Get permission from your Supervisor before: changing your home address, changing your job, leaving the State of Maryland, owning, possessing, using or having under your control any dangerous weapon or firearm of any description.
5. Obey all laws and incur no serious motor violation.
6. Notify your Supervisor at once if charged with a criminal offense and/or jailable traffic offenses.
7. Permit your Supervisor to visit your home unannounced.
8. Do not illegally possess, use, or sell any narcotic drug, controlled substance or related paraphernalia.
9. Appear in court when notified to do so.

B. Special Conditions:

- ☒ 10. Pay all fines, costs, restitution, and fees as ordered by the Court. If not paid timely, the Court may elect to send your case to the State's Central Collection Unit, which would result in an additional collection fee as permitted by law.
- ☒ 11. Totally abstain from alcohol and abusive use of any drug.
- ☒ 12. Submit to alcohol and other drug testing as directed by your Supervisor and pay any required costs.
- ☐ 13. Complete _____ hours of community service by _____ (Date).
- ☐ 14. Submit to alcohol and drug evaluation, testing, and treatment as directed by your Supervisor and pay any required costs.
- ☐ 15. Refrain from driving or attempting to drive after consuming alcohol.
- ☐ 16. Attend and successfully complete local Health Department drug treatment program and pay any required costs.
- ☐ 17. Attend and successfully complete local Health Department alcohol treatment program and pay any required costs.
- ☒ 18. Enroll in, pay any required costs for, and successfully complete treatment at _____ (facility).
- ☐ 19. Attend _____ self-help group meetings per week for _____ weeks. Attendance may be modified after _____ weeks by Supervisor.
- ☐ 20. Attend and successfully complete Motor Vehicle Administration Alcohol Education Program. (Social Drinkers Only.)
- ☐ 21. Obtain alcohol restriction on driver's license within 10 days of trial date for _____ year(s)month(s) ☐ period of probation.
- ☐ 22. Attend Victim Impact Panel meetings when notified.
- ☒ 23. Submit to evaluation and attend counseling for psychiatric or psychological treatment.
- ☒ 24. Have no contact with Lori Sander van and family
- ☐ 25. Do not enter or be found near _____
- ☐ 26. Attend and successfully complete MVA Driver Improvement Program.
- ☐ 27. Attend and successfully complete Special Health Education Program - Project SASOE.
- ☐ 28. Attend and successfully complete Juvenile Probation School.
- ☐ 29. Attend and successfully complete Parenting class as required.
- ☐ 30. Have Interlock installed for a period of _____ years _____ months _____ days. ☐ Employment vehicle exempt.
- ☐ 31. Attend and successfully complete Drug Education Program at _____
- ☒ 32. Other: court satisfied with current court follow
- ☐ 33. Transfer to _____
- ☐ 34. To register with the designated law enforcement agency as ☐ Tier I ☐ Tier II or ☐ Tier III sexual offender or ☐ sexually violent predator.
- ☐ 35. (Prince George's and Washington Counties only) To be supervised by means of active electronic monitoring (GPS Tracking System). ☐ To pay fee of \$_____ for monitoring. ☐ Fee waived.

C. ☐ Comply with special conditions of lifetime sexual offender supervision - see form # CC-DC/CR 136.

Your first appointment with the Supervising Agency is _____, and the place to report is _____. Your failure to report could result in your arrest.

Judge: _____ Date: 7/25/11

CONSENT

I have read, or have had read to me, the above conditions of probation. I understand these conditions and agree to follow them. I understand that if I do not follow these conditions, I could be returned to Court charged with a violation of probation.

☐ If I fail to abide by the above conditions, the Court could enter judgment against me and proceed with disposition as if I had not been placed under probation. I have been notified and I understand that by consenting to and receiving a stay of judgment under Criminal Procedure Article, § 6-220, I waive my right to appeal from a judgment of guilty by the Court in this case.

Witness: _____ Date: _____ Defendant: _____

Def. Jarrod W Ramos

Case/Citation No. 4A 231396

Address _____

(IF AVAILABLE, PLACE LABEL HERE)

Charge: Harassment

Sentence: 90 days suspended

☐ PBJ Length of Probation: one year

☐ Lifetime Sexual Offender Supervision by 18 months Management Team.



DISTRICT COURT OF MARYLAND FOR Anne Arundel County

RAMOS, JARROD WARREN

402 ARMSTRONG COURT APT. D
LAUREL, MD 20707-0000

Case No. 4A00231396

CC#:

LID:

Race: 2

DOB: 12/21/1979

NOV 15 '11

SID:

DL#:

Sex: M Ht: 6'0"

Wt: 180

Hair: BRN Eyes: BRN

Phone(H): 301-604-4877

Phone(W):

CHARGE: 001 1 OF 2 10191 CR3803 90 D &/or \$500.00 HARASS; A COURSE OF CONDUCT

AMENDED: ART. SEC. SUBSEC. PAR CJIS CODE:

PLEA ☒ G ☐ A.S.F. VERDICT ☒ G ☐ PBJ ☐ COMPROMISED ☐ NP ☐ NG ☐ DISMISSED ☐ JA ☐ MERGED ☐ STET ☐ NC ☐ NCR ☐ ABD ☐ NC ☐ MARITAL PRIVILEGE INVOKED AFTER SPOUSE SWORN ☐ COMMITTED CP 3-112 ☐ DISCHARGED ☐ RELEASED ☐ CONDITIONAL RELEASE ☐ COMMITTED CP 3-106b ☐ RELEASED ☐ MENTALLY CHALLENGED ☐ INCOMPETENT TO STAND TRIAL ☐ SUB-CURIA UNTIL

INCARCERATION ---

☐ REPEAT OFFENDER

☐ IN DEFAULT OF FINE \$

INCARCERATION 90 yrs/mos/days SENTENCE SUSP. 90 yrs/mos/days STARTING (DATE)

CONSECUTIVE TO CHARGE # CONCURRENT WITH CHARGE # CREDIT TIME SERVED yrs/mos/days

SENTENCE IS TO RUN (SELECT1):

☐ CONCURRENTLY WITH ANY OTHER OUTSTANDING SENTENCE.

☐ CONSECUTIVELY TO THE LAST SENTENCE TO EXPIRE OF ALL OUTSTANDING AND UNSERVED MARYLAND SENTENCES.

☐ CONSECUTIVELY TO THE SENTENCE IMPOSED IN CASE NUMBER:

☐ DOC ☐ JAIL ☐ WEEKEND INCARC. (WKS) ☐ HOUSE ARREST ☐ WORK RELEASE: ☐ RECOMMENDED ☐ ORDERED

FINES

FINE \$ 942.50 SUSP \$

DEFERRED UNTIL THRU: ☐ COURT ☐ P&P ☐ COMM IN DEFAULT

☐ ONE PAYMENT ☐ INSTALLMENTS OF \$ ☐ WEEK ☐ MONTH ☐ DUE TODAY \$

PAY PUBLIC DEFENDER \$ THRU: ☐ P&P ☐ PUBLIC DEFENDER BY: (DATE)

RESTITUTION \$ TO BY: (DATE)

☐ ONE PAYMENT ☐ INSTALLMENTS OF \$ ☐ WEEKLY THRU: ☐ P&P

☐ EARNINGS WITHHOLDING ORDER TO ISSUE ☐ MONTHLY ☐ OTHER

PROBATION ---

☒ DEFENDANT IS PLACED ON SUPERVISED PROBATION FOR 18 yrs/mos/days EFFECTIVE today (DATE)

☒ DEFENDANT IS PLACED ON SUPERVISED PROBATION FOR yrs/mos/days UPON RELEASE

☐ DEFENDANT IS PLACED ON UNSUPERVISED PROBATION FOR yrs/mos/days EFFECTIVE (DATE)

☐ SEE PROBATION/SUPERVISION DOCKET

☐ SPECIAL ATTENTION CODE

LIFETIME SUPERVISION ---

☐ LIFETIME SEXUAL OFFENDER SUPERVISION BY SEXUAL OFFENDER MANAGEMENT TEAM

COST \$22.50

☐ COST SUSP DUE TO INDIGENCY OF DEF.

☒ CICE \$35.00

☐ CICE SUSP DUE TO INDIGENCY OF DEF.

Judge: JL

Date: 7/26/11

FINGERPRINTING REQUIRED?

AFTER CONVICTION: ☐ FINGERPRINTING ORDERED ☐ EVALUATION ORDERED ☐ LICENSING AUTHORITY TO BE NOTIFIED

☐ PRE-SENTENCE INVESTIGATION UNTIL (DATE) ☐ BOND PENDING SENTENCE IS \$

APPEAL--- ☒ ADVISED OF RIGHT SENTENCE: ☒ TO BE STAYED ☐ NOT TO BE STAYED

☐ PRE-TRIAL RELEASE CONDITIONS TO CONTINUE ☒ APPEAL BOND REQUIRED IN AMOUNT OF \$ 200

CONDITIONS OF PROBATION: ☒ TO BE STAYED ☐ NOT TO BE STAYED

Judge: JL

Date: 7/26/11

Tracking No. 101001989911

TRIAL DOCKET

☐ DV
☐ CA
☐ VAA



DISTRICT COURT OF MARYLAND FOR Anne Arundel County

RAMOS, JARROD WARREN

402 ARMSTRONG COURT APT. D
LAUREL, MD 20707-0000

Case No. 4A00231396

CC#:

LID:

SID:

DL#:

Race: 2

Sex: M

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Wt: 180

Hair: BRN Eyes: BRN

DOB: 12/21/1979

Phone(H): 301-604-4877

Phone(W):

CHARGE: 002 2 OF 2 21135 CR3805 1 Y &/or \$500.00 ELEC MAIL HARASS

AMENDED: _____ ART. _____ SEC. _____ SUBSEC. _____ PAR _____ CJIS CODE: _____

☐ A.S.F.

PLEA ☐ G

☐ NG

☐ NC

☐ NCR

☐ INCOMPETENT TO STAND TRIAL

SUB-CURIA UNTIL _____

VERDICT

☐ G

☐ NG

☐ NCR

☐ COMMITTED CP 3-112

☐ COMMITTED CP 3-106b

☐ PBJ

☐ DISMISSED

☐ ABD

☐ COMPROMISED

☐ JA ☐ MERGED

☐ NC ☐ MARITAL PRIVILEGE INVOKED AFTER SPOUSE SWORN

☐ DISCHARGED

☐ RELEASED

☐ NP

☒ STET

☐ RELEASED

☐ CONDITIONAL RELEASE

☐ MENTALLY CHALLENGED

INCARCERATION ---

☐ REPEAT OFFENDER

☐ IN DEFAULT OF FINE \$ _____

INCARCERATION _____

yrs/mos/days

SENTENCE SUSP. _____

yrs/mos/days

STARTING _____

(DATE)

CONSECUTIVE TO CHARGE # _____

CONCURRENT WITH CHARGE # _____

CREDIT TIME SERVED _____

yrs/mos/days

SENTENCE IS TO RUN (SELECT 1):

☐ CONCURRENTLY WITH ANY OTHER OUTSTANDING SENTENCE.

☐ CONSECUTIVELY TO THE LAST SENTENCE TO EXPIRE OF ALL OUTSTANDING AND UNSERVED MARYLAND SENTENCES.

☐ CONSECUTIVELY TO THE SENTENCE IMPOSED IN CASE NUMBER: _____

☐ DOC ☐ JAIL ☐ WEEKEND INCARC. _____ (WKS)

☐ HOUSE ARREST

☐ WORK RELEASE:

☐ RECOMMENDED

☐ ORDERED

FINES ---

FINE \$ _____

SUSP \$ _____

DEFERRED UNTIL _____

THRU: _____

☐ COURT

☐ P&P

☐ COMM IN DEFAULT

☐ ONE PAYMENT

☐ INSTALLMENTS OF \$ _____

☐ WEEK

☐ MONTH

☐ DUE TODAY \$ _____

PAY PUBLIC DEFENDER \$ _____

THRU: _____

☐ P&P

☐ PUBLIC DEFENDER BY: _____

(DATE)

RESTITUTION \$ _____

TO _____

BY: _____

(DATE)

☐ ONE PAYMENT

☐ INSTALLMENTS OF \$ _____

☐ WEEKLY

THRU: _____

☐ P&P

☐ EARNINGS WITHHOLDING ORDER TO ISSUE

☐ MONTHLY

☐ OTHER _____

PROBATION ---

☐ DEFENDANT IS PLACED ON SUPERVISED PROBATION FOR _____

yrs/mos/days

EFFECTIVE _____

(DATE)

☐ DEFENDANT IS PLACED ON SUPERVISED PROBATION FOR _____

yrs/mos/days

UPON RELEASE

☐ DEFENDANT IS PLACED ON UNSUPERVISED PROBATION FOR _____

yrs/mos/days

EFFECTIVE _____

(DATE)

☐ SEE PROBATION/SUPERVISION DOCKET

☐ SPECIAL ATTENTION CODE

LIFETIME SUPERVISION ---

☐ LIFETIME SEXUAL OFFENDER SUPERVISION BY SEXUAL OFFENDER MANAGEMENT TEAM

Judge: _____

Date: _____

Tracking No. 101001989911

TRIAL DOCKET

☐ DV
☐ CA
☐ VAA



DISTRICT COURT OF 1. YLAND FOR

(City/County)

LOCATED AT (COURT ADDRESS)

~~7500 RITCHIE HWY~~
251 ROWE BLVD.DISTRICT COURT
CASE NUMBER

RELATED CASES:

COMPLAINANT

DEFENDANT

Lori Sondervan

Printed Name

Number and Street Address

City, State, and Zip Code

Telephone

Agency, sub-agency, and I.D. #

(Officer Only)

Jarrod Warren Ramos

Printed Name

402 Armstrong Ct. Apt B

Number and Street Address

Laurel MD 20707

City, State, and Zip Code

301-604-4577

Telephone

CC#

DEFENDANT'S DESCRIPTION: Driver's License#

Sex M Race W Ht 6'0 Wt 180

Hair Br Eyes Br Complexion Other

D.O.B 12/21/79 ID

APPLICATION FOR STATEMENT OF CHARGES

Page 1 of

I, the undersigned, apply for statement of charges and a summons or warrant which may lead to the arrest of the above named Defendant because on or about 2009-11/17/11 at Anne Arundel County

Date

Place

Jarrod Warren Ramos

, the above named Defendant

Beginning late 2009 or early 2010, Mr Ramos contacted me via email, thanking me for being the only person that was ever nice, or said hello to him high school. I responded, saying that I did not remember him, at which point he sent me photos. I still was not sure who he

(Concise statement of facts showing that there is probable cause to believe that a crime has been committed and that the Defendant has committed it):

(Continued on attached pages) (DC/CR 1A)

I solemnly affirm under the penalties of perjury that the contents of this Application are true to the best of my knowledge, information and belief.

Date

Officer's Signature

I have read or had read to me and I understand the Notice on the back of this form.

11/19/11

Date

Applicant's Signature

Subscribed and sworn to before me this

day of

Month

Time: 9:36 P M

Judge/Commissioner

Year

7054

I.D.

I understand that a charging document will be issued and that I must appear for trial ☐ on _____ at _____, ☐ when notified by the Clerk, at the Court location shown at the top of this form.

Time

Date

☒ I have advised applicant of shielding right. ☐ Applicant declines shielding.☐ I declined to issue a charging document because of lack of probable cause.

11/19/11

Date

Applicant's Signature

Commissioner

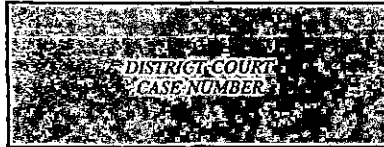
I.D.

TRACKING NUMBER



LOCATED AT (COURT ADDRESS)

251 PAWE BLVD

~~7600 PATENT HWY~~

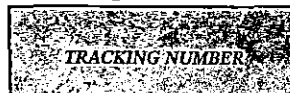
DEFENDANT'S NAME (LAST, FIRST, MI.)

Ramos, Jarrod W

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 2 of 5

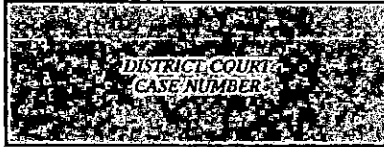
was, but he continued contact, and shared personal information about mental issues he had experienced since his teen years. Feeling bad for him, I shared some info, and referred him to the Oasis Center for Behavioral Health in Annapolis, an urgent care facility for mental health. He said he started going, and that it was really helpful. I began saving emails on 2/23/10. Prior to that, and for the next several months his emails became hateful, nasty, and vulgar. My last response to him was on 3/2/10, in which I asked him to stop with this contact. He continued. He told me to kill myself.

On 4/30/10, I was unexpectedly put on probation by Alan Burk, at my prior employer. Essex Bank 2120 Baldwin Ave. Crofton, MD 21114 (410) 721-7330. Alan was/is HR. My supervisor, Paul Michaud, same address and phone #, was as surprised as I was. On 5/20/10, 3 weeks later, Mr. Ramos forwarded me an email he had sent to Alan Burk

1/19/11
Date
Applicant's Signature



LOCATED AT (COURT ADDRESS)

~~2501 BITEH HAWAII~~
251 RANE ROAD

DEFENDANT'S NAME (LAST, FIRST, M.I.)

X Ramos, Jarrod W

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 3 of 5

on 4/26/10 - 4 days prior to my probation, I called Alan that morning, and he verbally confirmed that he had received the Email from Mr. Ramos, Subject line: Fire Lori Sandbrook, and that he called Mr. Ramos to discuss it. I was not given further detail. I call AAC PD and filed a report of harassment that day. I successfully completed my probation, during which time Paul Michaud, my supervisor, verbally confirmed that Alan Burk had put me on probation due to his communications with Mr. Ramos. In early September, I was terminated without cause.

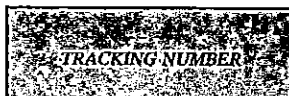
After the report I filed with AAC PD on 5/26/10, law enforcement left him a message, and I did not hear from him again.

Saturday 1/15/11, and today 1/19/11, I got 2 new messages from Mr. Ramos. They make no sense to me, but he does call me a "dirty slot" and threaten to make more phone calls telling people about the "real me."

1/19/11

Date

Applicant's Signature





LOCATED AT (COURT ADDRESS)

251 ROWE BLVD.



DEFENDANT'S NAME (LAST, FIRST, M.I.)

Ramos, Jarrod W

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 4 of 5

I have copies of emails dated 2/23/10 - 1/17/11. He tells me things such as I'm "living a lie," to several ways I should kill myself. Most of his messages are just pages of ramblings regarding my friends, family, job, Rotary Club involvement, all information I have to assume he got from the Internet. He calls me a "lush," and tells my prior employer that I'm a "a bipolar drunkard leading a double life." He says "in case you're wondering if you need a restraining order, I'm done bothering you now" though the messages continue. He questions me as to why I haven't been fired yet. He says "fuck you, leave me alone," when I haven't responded to him for months, since telling him to stop. He accuses me of being afraid to let a man get close to me. He thanks me for referring him to Oasis, but says I must have wanted more. Then he says "Have another drink and go hang yourself, you cowardly little lush. Don't contact you again? I don't give a shit. Fuck you." He again admits his "issues"

1/17/11

Date

Applicant's Signature





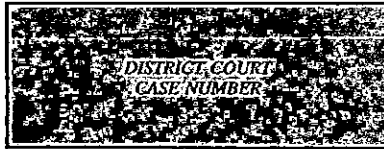
DISTRICT COURT OF MARYLAND AND FOR

AAO 7

(City/County)

LOCATED AT (COURT ADDRESS)

251 ROWE BLVD.



DEFENDANT'S NAME (LAST, FIRST, MI)

Ramos, Jarrod W.

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 5 of 5

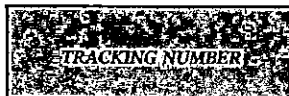
and says he's working with his therapist. In the same sentence he says he owes his life to me, but that I'm a hypocrite and he hates me.

I've filed 2 police reports, and tried to get this harassment stopped for more than a year. My last resort is pursue criminal charges under MD's electronic mail harassment law - Title 3, Subtitle 8, Section 3-805.

1/17/11

Date

Applicant's Signature



FEB 12, 2013
TUESDAYDISTRICT COURT OF MARYLAND
CRIMINAL SYSTEM INQUIRY CASE HISTORY DISPLAY02/12/13
DIST: 07

CASE: 4A00231396 CR STATUS: C CHG DATE: 13/02/07 CC: DIST: 07 01
TRACKING NO: 10-1001-98991-1 LOCAL ID: DOC: SUM ISSUED: 11/01/19
NAME: RAMOS, JARROD WARREN DOB: 79/12/21 HT/WT: 600 180 SEX/RACE: M2
ADDR: DISP: TRL 11/07/26 CNSL: B DEF:
402 ARMSTRONG COURT APT. D EVENT DATE: TIME:
LAUREL MD 207070000 ROOM: TYPE: DATE SET:
DPAY: DUE: FINAL: SID: LIFESUPV:

TYPE DATE BATCH PREP DATE/ID C COMMENT

COMM 130207	130130	7SP	DEF FILED PETITION FOR WRIT OF ERROR CORAM
COMM 130207	130130	7SP	NOBIS/TO JUDGE 9V9
SCHG 130207	130207	M203	T TO C
COMM 130208	130208	7SP	DEF'S MTN DENIED/9V9
COMM 130212	130211	7SP	DEF'S COMPLETED MTN SENT TO JUDGE
COMM 130212	130212	7SP	DEF'S MTN DENIED/9N6

END OF DISPLAY

P/1

PAGE 008